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October 5, 2007

Mr. Paul Peronard, U.S. Environmental Protection Agency  
Libby Asbestos Site Team Leader

Ms. Katherine Hernandez, U.S. Environmental Protection Agency  
Remedial Project Manager

Mr. Mark Raney, John A. Volpe Center National Transportation Systems Center  
Task Order Contracting Officer's Technical Representative

Subject: Draft Data Gap Analysis for Potential Contaminated Media, Former  
Stimson Lumber Site, Operable Unit 5

Dear Mr. Peronard, Ms. Hernandez, and Mr. Raney:

The purpose of this letter is to present data gaps between investigations already conducted and information needed to support a risk assessment and remedial investigation (RI) specific to the Stimson Lumber Site, Operable Unit (OU) 5. The data gaps were determined by reviewing all existing data for the site as presented in the Data Summary Report (DSR) for OU5 and comparing the data set to the conceptual site model (CSM), Figure 1. It is recommended that the data gaps identified and discussed be addressed as part of completing the risk assessment and RI for OU5.

In addition to the data gaps discussed in this analysis, an initial soils data gap analysis was previously completed for OU5. A sampling and analysis plan was developed to gather soil data required to fill the initial soil data gap identified. The soil sampling effort is currently scheduled to be completed in October 2007.

The CSM for OU5 (Figure 1) identifies several potential exposure pathways resulting in nine contaminated media of concern:

- Outdoor air near structural fire location
- Air in attic or near other unenclosed vermiculite
- Indoor air near breached walls

- Outdoor air near roads and rail spurs within OU5
- Indoor air (on-site buildings)
- Dust in air of vehicles
- Outdoor air near disturbed soil, wood chip piles, and waste bark piles
- General (ambient) outdoor air
- Dust in air from disturbances of roofing or other outdoor surfaces

This memorandum is organized to identify data gaps by the nine media of concern.

### **Outdoor Air near Structural Fire Location**

Outdoor air near structural fire locations has not been evaluated specific to potential exposures at OU5. All bulk vermiculite insulation has been removed from all on-site buildings. It is suspected that only remnants remain in the walls of the central maintenance building. Sources for this pathway are currently thought to be limited at the site, and therefore additional sample collection to evaluate this media of concern specific to OU5 are not warranted at this time.

### **Air in Attic or near Other Unenclosed Vermiculite**

Air in attics or near other unenclosed areas of vermiculite has not been evaluated specific to potential exposures at OU5. As mentioned above, the only vermiculite insulation at the site are remnants that remain in the walls of the central maintenance building. Sources for this pathway are currently thought to be limited at the site, and therefore additional sample collection to evaluate this media of concern specific to OU5 are not warranted at this time.

### **Indoor Air near Breached Walls**

Indoor air near breached walls has not been evaluated specific to potential exposures at OU5. The only vermiculite insulation at the site is remnants that remain in the walls of the central maintenance building. Sources for this pathway are currently thought to be limited at the site, and therefore additional sample collection to evaluate this media of concern specific to OU5 are not warranted at this time.

### **Outdoor Air near Roads and Rail Spurs within OU5**

Outdoor air near roads and rail spurs within OU5 has not been evaluated specific to potential exposures at OU5. The roads and rail spurs within OU5 are currently used daily, and therefore exposure to this media of concern is ongoing at the site. Additional sampling should be considered to evaluate this media of concern specific to OU5.

## **Indoor Air (On-Site Buildings)**

Indoor air has been evaluated in a past sampling event using personal and stationary (indoor and outdoor) air monitoring in 2002. This information is summarized in the Final DSR for OU5 (CDM 2007). Because the use and/or configuration of many of the site buildings has changed since the 2002 sampling event was conducted, an indoor air sampling program is currently being designed by EPA to collect information related to this media of concern.

## **Dust in Air of Vehicles**

Air in vehicles has not been evaluated specific to potential exposures at OU5. Exposure to this media of concern is likely and therefore sampling to evaluate this specific media of concern should be considered either specific to OU5 or in conjunction with studies related to other operable units.

## **Outdoor Air near Disturbed Soil, Wood Chip Piles, and Waste Bark Piles**

Outdoor air near disturbed soils is a media of concern that has been evaluated with a limited sampling effort at OU5. In 2005, two locations within OU5 were sampled as part of the SQAPP sampling activities. During this event, one location with trace amounts of LA and one location with non-detect levels of LA were included in an ABS sampling activity. To supplement this data set it is recommended that the current data being generated from the OU4 outdoor ABS activities be used as a surrogate data source for this exposure pathway.

Outdoor air near disturbed wood chip and waste bark piles will be evaluated as described in the current initial soils gap SAP. The current initial soil data gap SAP calls for the collection of personal air samples from the excavator operator and the sample collection personnel. These samples are opportunistic in nature and are intended to provide an understanding of the range of exposures associated with this activity.

## **General Outdoor Ambient Air**

Information from the current outdoor ambient air program, initiated in October 2006 and scheduled to be completed in October 2008, will fill the data gap for determining outdoor ambient air exposures. Therefore, additional sample collection is not recommended specific to this data gap.

## **Dust in Air near Disturbances of Roofing or Other Outdoor Surfaces**

Air near disturbances of roofing or other outdoor surface has not been completed specific to OU5. Exposure to this media of concern is likely and therefore sampling to

evaluate this specific media of concern should be considered either specific to OU5 or in conjunction with studies related to other operable units.

## Summary

The following table summarizes each of the nine media of concern discussed above and indicates if a data gap currently exists specific to OU5 for each media.

Media of Concern	Current Data Sufficient to Determine Exposure (Yes/No)	Additional Sampling Recommended (Yes/No)	Comments
Outdoor air near structural fire location	No	No	Source of media limited within OU5
Air in attic or near other unenclosed vermiculite	No	No	Source of media limited within OU5
Indoor air near breached walls	No	No	Source of media limited within OU5
Outdoor air near roads and rail spurs within OU5	No	Yes	
Indoor air (on-site buildings)	No	Yes	Current sampling plan for evaluation is underdevelopment
Dust in air of vehicles	No	Yes	
Outdoor air near disturbed soil, wood chip piles, and waste bark piles	No	Yes	Sampling event currently planned for October 2007 to collect samples for evaluation of this media of concern
General (ambient) outdoor air	No	Yes	Outdoor ambient air monitoring program currently on-going to collection samples for evaluation of this media of concern
Dust in air from disturbances of roofing or other outdoor surfaces	No	Yes	

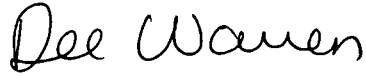
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If you have any questions or concerns, please feel free to contact me at (720) 264-1121.

Very truly yours,

A handwritten signature in black ink that reads "Dee Warren". The signature is written in a cursive, flowing style.

Dee Warren

CDM Federal Programs Corporation

Cc: Chris Weis, USEPA

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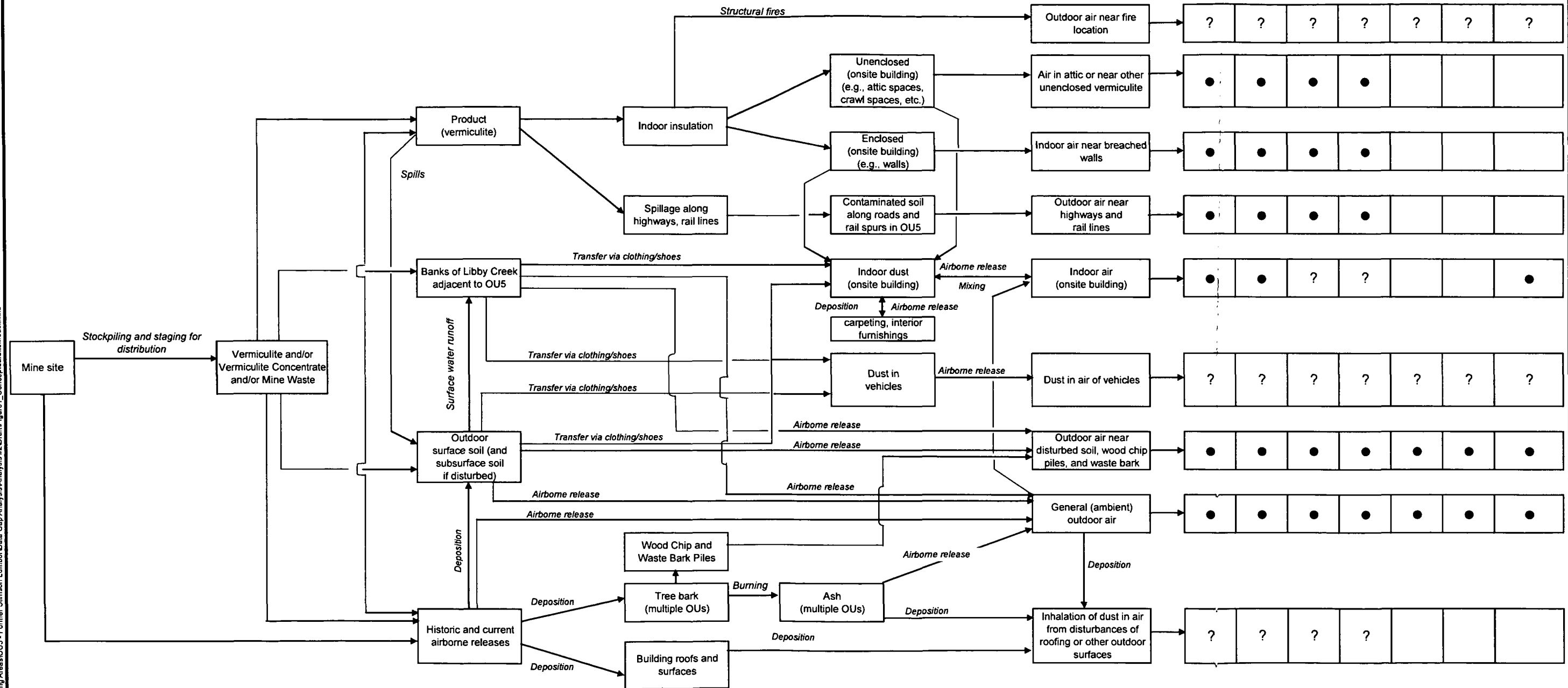
## Sources

## Release and Transport Pathways

## Contaminated Media

Receptor and Exposure Location  
(Current and Hypothetical Future)

Commercial Worker		Tradesperson		Recreational Visitor		Resident
Current	Future	Current	Future	Current	Future	Future



## KEY

●	Pathway is complete and exposure may be significant; quantitative evaluation is warranted
○	Pathway is complete but is believed to be minor in comparison to other pathways; qualitative evaluation is warranted
?	Pathway may be complete but magnitude of exposure is uncertain; further investigation may be necessary
	Pathway is incomplete or believed to be negligible; further evaluation is not warranted

**Figure 1**  
**CONCEPTUAL SITE MODEL**  
**FOR INHALATION EXPOSURES**  
**TO ASBESTOS**  
**Stimson Lumber Company, OU5**

**Libby Asbestos Project**  
**Libby, Montana**

# CDM